HISTORIC SEATTLE



13 December 2010
Via Email

Angela Freudenstein
Alaskan Way Viaduct Replacement Project
Washington State Department of Transportation
999 Third Avenue, Suite 2424
Seattle, WA 98104

Re: Comments on the Supplemental DEIS and Section 4(f) Evaluation for the Alaskan Way Viaduct Replacement Project

Dear Ms. Freudenstein:

This letter provides comments on the 2010 Supplemental Draft Environmental Impact Statement (SDEIS) for the Alaskan Way Viaduct Replacement Project. I am writing on behalf of Historic Seattle, which is Seattle and King County's only nonprofit membership organization dedicated to preserving our architectural legacy. Our mission is to educate, advocate and preserve. Historic Seattle is also a Section 106 Consulting Party in this process.

From our review of the SDEIS and Section 4(f) Evaluation, the most adverse impacts appear to be in the Pioneer Square Historic District, listed on the National Register of Historic Places and designated as a City of Seattle historic district. **Following are our concerns regarding impacts to historic and cultural resources.**

C-015-001

**-The Pioneer Square Historic District as a whole will be adversely affected, directly and indirectly.**

In the Section 4(f) Evaluation, the historic district is not included as a "resource subject to use under 4(f)," but some individual resources within the district are subject to use. How does 4(f) apply in a National Register-listed district such as the Pioneer Square Historic District? Why are the effects on the district as a whole not considered an impairment on the district?

C-015-002

Pioneer Square is the city's original business district defined by the interplay of buildings and structures, system of alleys, sidewalks, areaways, and streets. The pedestrian-friendly character of the district will be greatly impacted by the tens of thousands of vehicles expected to go through city streets (specifically Pioneer Square streets) as a result of the proposed south portal for SR 99. Can this old and historic infrastructure, built on fill, carry the heavy loads and volumes of traffic that are projected? Since there is no central downtown access proposed, Pioneer Square will be taking the "hit" as a thoroughfare for city traffic. Is there a plan to deal with these traffic impacts to the streets of the historic district to protect its pedestrian character?

**C-015-001**

The Section 4(f) Evaluation in the Final EIS and Appendix J, Section 4(f) Supplemental Materials, recognize that the Pioneer Square Historic District is a protected 4(f) resource and discuss the effects of the build alternatives on this resource.

Through the Section 106 process for the Bored Tunnel Alternative, FHWA has concluded that the effects on the four historic properties would result in an adverse effect that would constitute a use under Section 4(f): the Alaskan Way Viaduct and Battery Street Tunnel, Seattle Maintenance Yard (Archaeological Site 45K1958), Lake Union Sewer Tunnel, and Western Building, which is a contributing building within the Pioneer Square Historic District. The Western Building is the only property within the Pioneer Square Historic District with effects that rise to a level that constitute a Section 4(f) use.

**C-015-002**

Analysis of traffic patterns for vehicles accessing ramps to and from SR 99 in the stadium area show that vehicles will disperse on to a variety of streets in the area such as Royal Brougham, Alaskan Way, First Avenue, and Fourth Avenue. Please see the Final EIS Appendix C, Transportation Discipline Report for transportation analysis. Included within the discipline report are a variety of metrics that looked at roadway and intersection performance. These analyses were performed with analytical tools using data for a range of modes including pedestrians, trucks, transit, ferries and automobiles.

The Pioneer Square Historic District would experience an increase in traffic, but effects related to the project would not rise to the level of a Section 4(f) use of the district. Please see Appendix I, Historic, Cultural, and Archaeological Resources Discipline Report, of the Final EIS for the discussion of project effects on Pioneer Square for all the alternatives.

C-015-003

The Section 106 Cultural Discipline Report (Appendix I) does not adequately recognize indirect effects to the historic district. It focuses on direct effects to specific buildings during construction. How will the considerable traffic impacts to the historic district be dealt with after construction of the preferred alternative (Bored Tunnel) is completed?

**-Building Damage Assessment**

C-015-004

Exhibit 6-2 (Potential Effects on Historic Properties) in Appendix I (pp. 97-98) focuses on potential damage to 15 buildings within the Pioneer Square Historic District and outside the district. How accurate are the effects determination? What happens if the effects are greater than anticipated? The majority of the effects are classified as "slight" at this point. What if, in reality, they become "moderate" or worse? What are the proposed actions to deal with this potential?

C-015-005

The building damage assessment (pp. 95-96) focuses on the Western Building and Polson Building, both contributing resources to the historic district, because they will be adversely affected by construction. Section 6.2.1 (Built Environment Resources, p. 103) states that (in reference to the Western Building) "Given the current condition of the building, demolition may be the only safe option." It goes on to say, "Further analysis of the building options is being performed." What are these options? Where are the structural engineer's report and cost estimates for stabilizing the structure? Are there different ways to structurally stabilize the building? A temporary, exterior, steel frame is mentioned as needed to stiffen and strengthen the building. A temporary exterior, steel frame was used to shore up the Cadillac Hotel Building in Pioneer Square after the 2001 Nisqually earthquake so there is precedent in the district for similar treatment. Many also thought the Cadillac Hotel could not be saved after the earthquake, yet it was successfully rehabilitated and since 2005, has stood as a model for restoration in Pioneer Square. Granted, the foundation conditions are probably different and there are other issues at play here.

WSDOT should consider carefully the ramifications of demolishing a contributing resource in the Pioneer Square Historic District. The district has not lost a building in a long time (if you don't count the King Dome). The point is made clearly in the SDEIS that the existing condition is poor but this takes nothing away from its value to the district. Neither Section 106 nor Section 4(f) take cost into consideration. It appears the proposed mitigation measures for the Polson Building would stabilize the structure during construction and not jeopardize it.

Thank you for the opportunity to comment.

Sincerely,

Eugenia Woo

Eugenia Woo
Director of Preservation Services



**C-015-003**

Analysis of traffic patterns for vehicles accessing ramps to and from SR 99 in the stadium area show that vehicles would disperse onto several streets such as S. Royal Brougham Way, Alaskan Way, First Avenue, Fourth Avenue, etc. Please see the Final EIS Appendix C, Transportation Discipline Report for the transportation analysis.
The Final EIS Appendix I (Historic, Cultural, and Archaeological Discipline Report) also addresses traffic and historic districts. Because traffic in Pioneer Square is controlled by signals, it is not anticipated that the increased volume will affect the pedestrian character nor will it make it more difficult to walk to shops or restaurants. Pioneer Square has historically been an active place with a high volume of traffic. Modest increases in traffic volumes are expected between 2015 and 2030. In most cases, these traffic volume increases are related to expected population and employment growth in the study area and region.

**C-015-004**

The effects determination is based on review of building plans and inspections of all buildings along the alignment by structural engineers. The buildings will be inspected again before tunneling begins. Extensive monitoring of each building and structure will be undertaken before, during and after tunneling. This will enable any settlement impacts to be detected immediately so that they can be prevented or minimized. If damage does occur to historic buildings, it will be repaired according to the Secretary of the Interior's Standards for Rehabilitation of Historic Properties. The monitoring plan and mitigation are addressed in the Section 106 Memorandum of Agreement and in Chapter 6 of Appendix I (Historic, Cultural, and Archaeological Discipline Report) of the Final EIS.

**C-015-005**

The Western Building's existing poor structural condition means that it cannot withstand settlement as well as other nearby historic buildings. After studying various options for retrofitting or demolishing the building,

and receiving public input, WSDOT determined that a protection plan for the Western Building could be implemented with the Bored Tunnel Alternative. The settlement impacts would be mitigated by:

1. Strengthening the foundation with micro piles and grade beams, or constructing a reinforced concrete wall system, or using a combination of both approaches.
2. Installing epoxy grout and wrap on cracked concrete columns and beams.
3. Constructing a temporary exterior steel frame and interior shoring and bracing.
4. Injecting compensation grout to manage building settlement to less than 0.5 inches.

The steel framing and the interior shoring and bracing would be removed when the risk of settlement diminishes, leaving the exterior appearance of the building approximately the same as it is currently. The work would be reviewed by the Pioneer Square Preservation Board and would be done in compliance with the Secretary of the Interior's Standards for Rehabilitation of Historic Buildings (36 CFR 67.6). This work would require tenants to be relocated. The building would be unavailable for 12 to 20 months while it is being reinforced.

The Polson Building is not at risk of collapse or demolition, even though it shares an adjoining wall with the Western Building. The surrounding soil would be stabilized with compaction grouting and, if needed, the basement would be reinforced on the interior.

Buildings and structures (both historic and non-historic) along the alignment have been inspected and evaluated by structural engineers. The potentially affected buildings and the monitoring plan are discussed in Chapter 6 of Appendix I, Historic, Cultural, and Archaeological Discipline Report, of the Final EIS. The construction process includes

monitoring of selected buildings and structures before, during and after tunneling. This will enable any settlement impacts to be detected immediately so that they can be prevented or minimized. If damage does occur to historic buildings, it will be repaired according to the Secretary of the Interior's Standards for Rehabilitation of Historic Properties.